

Redacted pages 3, 16, 19-81. Exemption 4 - CBI

**US Environmental Protection Agency  
Region VII  
901 N. 5<sup>th</sup> St.  
Kansas City, Kansas 66101**

**Nutra-Flo Company  
Port Neal Facilities  
2717 Port Neal Circle  
Sergeant Bluff, IA 51054**

**FILE # IA00639**

**September 22, 1998  
August 6, 1999**



R00147462  
RCRA RECORDS CENTER

0001

Friday, August 06, 1999

U.S. Environmental Protection Agency, Region VII  
Kendra Kennell  
901 N. 5<sup>th</sup> St.  
Kansas City, Kansas 66101  
913-551-7136

RE: Nutra-Flo  
Sergeant Bluff, Iowa  
FILE # IA00639

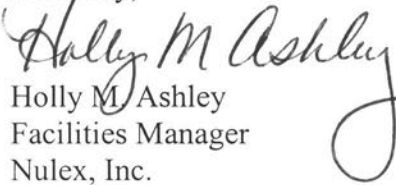
Dear Ms. Kennell,

As per the phone conversations between yourself and Lynn Richardson of our office the following attachments are copies of:

1. The receipt for documents and samples provided to Dedriel Newsome on 09-22-98.
2. The Confidentiality Notice
3. Notice of Violation
4. The response to the Notice of Violation that we had corrected those items identified. It was originally sent by us on October 12, 1998. It was also sent again by certified mail on January 15, 1999, at which time I included some additional documentation to back up the new procedures.
5. I have reassembled to the best of my recollection the same documents listed on the "Receipt for Documents and Samples".
  - a. Blank Certificate of Raw Material
  - b. List of Suppliers
  - c. Lab Analysis
  - d. Process Diagrams
  - e. Layout
  - f. MSDS's

It is our understanding that you have accepted our corrective actions for the Notice of Violation and that these copies will assist you in closing this file. However, should you have any further requests Lynn Richardson will be available to assist you in his role as the Health, Safety, and Environmental Manager for the Nutra-Flo Company. I have included his business card for your files. For your future information, the Nutra-Flo, Port Neal Facility has become its own corporation named Nulex, Inc.

Sincerely,

  
Holly M. Ashley  
Facilities Manager  
Nulex, Inc.


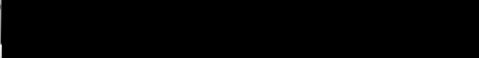
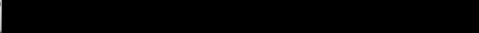
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <b>Nutra Flo</b>
Facility Address <b>SP. Bluff, IA</b>

Documents Collected? YES ☒ (list below) NO ☐  
Samples Collected? YES ☒ (list below) NO ☐ Split Samples: YES ☒ NO ☐  
Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐  
Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Certificate of Raw Mat'l (1 pgs) 012 Zn/Fe Crystal West Outside  
MSDS (77 pages)  
List of Suppliers (2 pgs)  
Lab Analysis (1 pg)  
Process Diagram (9 pgs)  
Layout  
Samples  
001 - Sal Skim Bay 3  
002 " " " 5  
003 " " " East Drums  
005 Zn Ash Bay 6  
007 Zn Oxide Bay 6  
007 D Zn Oxide North east Bag  
009 Zn/Fe Crystal -   
010 " " "   
011 " " " 

Redacted Exemption 4 - CBI

Facility Representative (print) <b>DIRK LOLEY</b>	Signature/Date <b>Dirk Loley 9-22-98</b>
Inspector (print) <b>Dedrie Newsome</b>	Signature/Date <b>Dedrie Newsome 9/22/98</b>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <b>Nutra Flo</b>	
Facility Address <b>Port Neal, IA</b>	
Inspector (print) <b>Dedriel Newsome</b>	
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	Date <b>9/22/98</b>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date
<b>DIRK LOWERY</b>	<b>W. L. Lowery</b> 9-22-98

Information for which confidential treatment is requested:

**PROCESS FLOW DIAGRAMS**

**LIST OF SUPPLIERS**

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

Facility Name: Nutra Flo  
Address: 2717 Port Neal Circle  
Seigent Bluff, IA 51054  
EPA ID Number: Non-Notifier Date: 9/22/98

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

<u>Citation</u>	<u>Description of Violation</u>
1. <del>40 CFR 262.11</del>	Make a hazardous waste determination on 4 unknown drums; aerosol cans; fluorescent light bulbs
2. 40 CFR 279.22(c)	Failure to label used oil drums
3. 40 CFR 279.22(d)	Failure to clean up oil spills

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII  
25 Funston Rd  
Kansas City, KS 66115  
ATTN: Dedriel Newsome

If you have any questions about this Notice or wish to discuss your response, you may call me at  
(913) 551-5058, or Beth Koesterer (Compliance Officer) at  
(913) 551-7673.

This Notice prepared by Dedriel Newsome Date: 9/22/98

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Dirk Lohr Date: 9-22-98  
Signature: [Signature]  
Title: PRM

Monday, October 12, 1998

U.S. Environmental Protection Agency, Region VII  
25 Funston Rd  
Kansas City, KS 66115  
Attn: Dedriel Newsome


Holly M. Ashley  
Facilities Manager  
Nutra-Flo Port Neal Facilities  
2717 Port Neal Circle  
Sergeant Bluff, IA 51054

Dear Dedriel Newsome,

This letter is in response to a visit to the Nutra-Flo Port Neal Facilities by you, on 09-22-98. At that time there were three areas of noncompliance noted. Below is a table of the area the brief description and the corrective action taken to be in compliance with the CFR's.

Area	Description	Corrective Action
40 CFR 262.11	Make a hazardous waste determination on 4 unknown drums; aerosol cans; fluorescent light bulbs.	The four unknown drums were identified as used glycol from a heat exchanger and will be disposed of through an appropriate facility. See attached copy of new procedure covering fluorescent light bulbs and aerosol cans.
40 CFR 279.22(c)	Failure to label used oil drums.	Drums were labeled and attached is a copy of the disposal through an appropriate facility. See attached copy of the bill of lading to pick them up. See attached procedure covering used oil.
40 CFR 279.22(d)3	Failure to clean up oil spills.	The oil contaminated dirt is being stored in labeled empty barrels awaiting permission for disposal contaminated dirt at the appropriate facility.

Sincerely,

  
Holly M. Ashley  
Facilities Manager  
Nutra-Flo Port Neal Facilities



## Disposing of Used Oil and Antifreeze/Glycol

**PURPOSE** - The purpose of this procedure is to ensure proper disposal of used oil, oil filters and antifreeze/glycol.

### INSTRUCTIONS

#### 1. Used Oil and Oil Filters

- 1.1. During activities to change out oil in vehicles ensure all oil is captured and placed in the drums marked "USED OIL" that are normally kept in the compressor room for containment of oil spills.

- 1.1.1. If there is an oil spill immediately notify management so it can be properly cleaned up and reported.

- 1.2. Drain the oil filter and keep for return to Soo Land Bobcat for proper disposal.

- 1.3. When the barrel is full notify, Jebro, Inc at (712) 277-8855 for disposal.

#### 2. Antifreeze/Glycol

- 2.1. During activities where antifreeze or glycol is being drained/released from the system, ensure all liquid is captured and placed in the drums marked "USED ANTIFREEZE".

- 2.1.1. If there is an antifreeze or glycol spill immediately notify management so it can be properly cleaned up and reported.

- 2.2. When the barrel is full notify Safety Kleen at 402-333-6321 for disposal.

## Disposing of Florescent Light Bulbs and Aerosol Spray Cans

**PURPOSE** - The purpose of this procedure is to ensure proper disposal of florescent light bulbs and aerosol spray cans.

### INSTRUCTIONS

#### 1. Florescent Light Bulbs

- 1.1. During activities to replace florescent light bulbs take extra caution to not break the bulb.
  - 1.1.1. IF the bulb is broken notify management.
- 1.2. Return the used bulb to the storage container marked "Used Florescent Bulbs" in the electrical room of Nulex for appropriate disposal.
- 1.3. When the storage container is full notify, Safety Kleen for pickup to be disposed of at an approved disposal facility for florescent light bulbs.

#### 2. Aerosol Spray Cans

- 2.1. Upon emptying an aerosol can dispose of it in a storage container marked "Used Aerosol Cans".
- 2.2. Prior to storage container becoming full, the cans will be punctured and contents completely emptied into a 55 gallon drum marked "Aerosol Can Recycling Material".
  - 2.2.1. Use the aerosol can depressurizer with combination filter to reduce flammable V.O.C. emissions.
- 2.3. Then disposed of the empty can in any waste container.
- 2.4. When the 55 gallon drum marked "Aerosol Can Recycling Material" is full notify Safety Kleen for pickup and recycling of contents.



DATE 10-2-98 TERMINAL NO. Shelby  
 CARRIER NO. 513 KITS 0  
 WPG 7.45 HALOGENS/SNIFFER OK  
 TERMS \_\_\_\_\_ TANK # 34

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

US DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

EMERGENCY TELEPHONE NO. 1-800-424-9300

038564  
**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Metric to chemical co  
 Port Neal*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
 1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	100				N/A	
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER Tom Hill CARRIER Jim Kelshner

This shipment shall be governed by (A) the contract between shipper and carrier or a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification, No. A-9, MF-1 C-C-9, supplements thereto, or to the extent of carrier's contract, provided that this bill of lading is not shipped by common carrier in a state where this bill of lading form is not applicable, provided that this bill of lading is not shipped by common carrier in a state where this bill of lading form is not applicable, provided that this bill of lading is not shipped by common carrier in a state where this bill of lading form is not applicable.

Carrier warrants that the goods are properly loaded, secured, and unloaded, and that the goods are delivered to the consignee in the same condition as received, subject to the exceptions and conditions set forth in the bill of lading.

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

Monday, October 12, 1998

U.S. Environmental Protection Agency, Region VII  
25 Funston Rd  
Kansas City, KS 66115  
Attn: Dedriel Newsome


Holly M. Ashley  
Facilities Manager  
Nutra-Flo Port Neal Facilities  
2717 Port Neal Circle  
Sergeant Bluff, IA 51054

Dear Dedriel Newsome,

This letter is in response to a visit to the Nutra-Flo Port Neal Facilities by you, on 07-22-98. At that time there were three areas of noncompliance noted. Below is a table of the area the brief description and the corrective action taken to be in compliance with the CFR's.

Area	Description	Corrective Action
40 CFR 262.11	Make a hazardous waste determination on 4 unknown drums; aerosol cans; fluorescent light bulbs.	The four unknown drums were identified as used glycol from a heat exchanger and will be disposed of through an appropriate facility. See attached copy of new procedure covering fluorescent light bulbs and aerosol cans.
40 CFR 279.22(c)	Failure to label used oil drums.	Drums were labeled and attached is a copy of the disposal through an appropriate facility. See attached copy of the bill of lading to pick them up. See attached procedure covering used oil.
40 CFR 279.22(d)3	Failure to clean up oil spills.	The oil contaminated dirt is being stored in labeled empty barrels awaiting permission for disposal contaminated dirt at the appropriate facility.

Sincerely,

  
Holly M. Ashley  
Facilities Manager  
Nutra-Flo Port Neal Facilities

US Postal Service

# Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	US EPA
Street & Number	25 Funston Rd
Post Office, State, & ZIP Code	KC KS 66115
Postage	\$ 55
Certified Fee	140
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$195
Postmark or Date	97

PS Form 3800, April 1995

## F I S H E R S C I E N T I F I C

OCT 28, 1998

O R D E R A C K N O W L E D G E M E N T

PAGE: 1

THANK YOU FOR YOUR ORDER... ANY QUESTIONS REGARDING THIS ORDER,  
CALL 1-(800) 766-7000 TO SPEAK TO A CUSTOMER SERVICE REPRESENTATIVE

ORDER NBR: D83011808      ACCT NBR: 454749-001      ORDER DATE: OCT 28, 1998  
CUST PURCH NBR: 61498      REL NBR:  
CALLER: DOYLE MEEKER      PHONE NBR: (712)279-1930

SHIP TO: NUTRA FLO CHEMICAL CO  
1919 GRAND AVE

SOLD TO: NUTRA FLO CHEMICAL CO  
1919 GRAND AVE

SIOUX CITY

IA 51106

SIOUX CITY

IA 51106

LN	QTY	UN	CATALOG NBR	DESCRIPTION	UNIT PRC	TOTAL AMT
001	1	EA	19085740	AEROSOLV SYS W/PUNCTURING DELX. 1 BACKORDERED	472.89	472.89
002	1	EA	19077306	COMBO/COALESCING CARBON FILTER 1 SHIPPING FROM TUS	122.08	122.08
MERCHANDISE TOTAL:						594.97

THE INVOICE AMOUNT MAY INCLUDE TRANSPORTATION, TAX, AND  
OTHER MISC ORDER CHARGES AS DETERMINED BY YOUR CONTRACT.

26117 - 578



One Brinckman Way

ELGIN, IL

S 80123-7857

PLACEMENT FORM

5-127-01

R SERVICE CALL

BRANCH MANAGER

2 333-6321

DOUG LIEBE

REFERENCE NUMBER

P54109

GENERATOR LOCATION

ULTRA-140  
ANNUAL PORT WEAL KRECHIE  
HOLLY DE 10M  
SERGEANT BLUFF IOWA  
STOCH

DUNS NO. 05106-0408

FED. ID NO. 99-6090019

BILL TO (IF DIFFERENT FROM LOCATION)

NAME

TITLE

SIGN

1.		
2.		

5	LOCATION	01	SIC CODE
BUSINESS TYPE	CHAIN	ASSOCIATION	SVC. P/C
PROD. P/C	SALES TAX EXEMPTION NUMBER		

DATE PLACED 10.28.98

SALES REP NO. 1281

CUSTOMER'S P.O. NUMBER

BLANKET

TEMPORARY

CUSTOMER PHONE NO.

712-943-3983

HANDLING CODE

CREDIT CODE

SERVICE TAX

C.O.M.S. TAX

PRODUCT TAX

DEPT.	SERVICE/PRODUCT	SERIAL NUMBER	REMARKS/UNIT PRICE	QUAN.	CHARGE	SALES TAX	TOTAL CHARGE	SOLVENT/DRUMS	CC	SERVICE TERM	SCHEDULE DATA	FREE TRIAL	INV. CODE	PROMO NO.	RELEASE NO.	MSDS GIVEN
1			8# Box for Bulbs	1	98.00	-	98.00									
2			4# Box for Bulbs	1	52.00	-	52.00									
3																
4																
5																
6																
7																
TOTAL-SERVICE/PRODUCTS					2	150.00	150.00									

MANIFEST NO. USEPA TRANSPORTER ID NO. GENERATOR USEPA ID NO. GENERATOR STATE ID NO.

ILD984908202

11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)

WAST COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D039, D008, D018, D040) (ERG#128) 6.7#/GAL

WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001) (D006, D008, D018, D027, D039, D040) (ERG#128)

RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001) (D006, D008, D018, D027, D039, D040) (ERG#128)

12. CONTAINERS NO. TYPE 13. TOTAL QUANTITY 14. UNIT WT/VOL SK DOT NUMBER 5163055

975

10082

10083

I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES:

0 TO 220 LBS./MONTH

INITIALS

220 LBS. TO 2,200 LBS./MONTH

INITIALS

GREATER THAN 2,200 LBS./MONTH

INITIALS

DESIGNATED FACILITY NAME AND ADDRESS

SAFETY-KLEEN SYSTEMS, INC.

USA EPA ID NO.

STATE ID NO.

TOTAL CHARGE (FROM ABOVE)

TOTAL DUE

150.00

DO NOT WRITE IN AREA BELOW

P54109

1281

CUSTOMER

PART NO. 1360 (Rev 8/97)





NUTRA-FLO CHEMICAL  
2717 Port Neal Circle  
XXXXXXX  
Sargeant Bluff, Iowa 51054

Invoice Date	10/17/98
Invoice No.	UD038564
Invoice Amount	\$30.00
Customer No.	001080

**PLEASE RETURN THIS PORTION OF THE INVOICE WITH YOUR PAYMENT**

Customer No.	001080	Product or Service	Unit	Quantity	Unit Price	Total Price
Invoice No.	UD038564					
Ship Date	10/02/98	PUMPING CHG	EA	30.000	\$1.0000	\$30.00
Invoice Date	10/17/98					
Manifest No.	UD038564					
PO Number	N4106					
P.A. No.	0000000					
Proj. No. 0						

Unit Number JEB513  
Freight Type Prepaid  
igin SIOUX CITY  
Destination PICKUP USED OIL

**Taxable Amount**  
**\$0.00**

## NO LOCAL OPTION ##  
IOWA RESALE

Terms NET 30

**Total Invoice      \$30.00**

**Jebro, Inc., P.O. Box 3586, Sioux City, Iowa 51102**

[illegible]

TELEPHONE: (712) 943-3983

## PURCHASE ORDER

NO. N

4106

BY

Holly M Ashley

DATE 10-2-98 TERMINAL NO. Port of New York  
 CARRIER NO. 513 KITS 0  
 WPG 7.45 HALOGENS/SNIFFER OK  
 TERMS \_\_\_\_\_ TANK # 34

038564  
**MOTOR CARRIER BILL OF LADING**  
 Received, subject to tariffs and/or contract in effect on date of  
 issuance hereof.

*Metra-1 to chemical co  
 Port New*

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

US DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

**EMERGENCY TELEPHONE NO. 1-800-424-9300**

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
 1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	100				N/A	
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER Tom Hill CARRIER Jim Kelschen

This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9 MF 1 C C-9 supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading.

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper.

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER



NUTRA-FLO COMPANY  
2717 PORT NEAL CIRCLE  
SERGEANT BLUFF, Iowa. 51054

CERTIFICATE OF RAW MATERIAL SUBSTITUTION

I, Terry Robinson, Port Neal Plant Manager of Nutra-Flo Co. hereby certify based on laboratory analysis that (material) \_\_\_\_\_ generated by \_\_\_\_\_ is an acceptable substitution for the raw materials currently being used to manufacture our liquid zinc micro nutrient fertilizer and or feed grade zinc/iron sulfate micronutrient.

I further certify that after receiving this material, all of it will be used in the manufacture of fertilizer and or feed grade zinc/iron sulfate micronutrient, not be disposed of or intentionally released to the environment. Terry Robinson \_\_\_\_\_

STATE OF IOWA                                 )  
  ) SS:  
COUNTY OF WOODBURY                     )

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by the above named \_\_\_\_\_ known person whose name and signature appear above.

\_\_\_\_\_  
Notary Public in and for the State of Iowa

(Seal)

My commission expires the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Generator. \_\_\_\_\_  
Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

Being the generator of the above mentioned co-product or secondary material, our company does believe to the best of our knowledge and ability, that this material is not a waste. This material contains valuable ingredients needed for the manufacture of fertilizer and feed grade micronutrients. This material is sold to Nutra-Flo Company for the single purpose as a raw material substitute.

Furthermore our company, has made specific changes in the chemistry and or physical nature of the material to enhance the value of this co-product so that it can be used as an effective substitute for comparable commercial products.

Generator Representative \_\_\_\_\_  
(Signature)





# Midwest Laboratories, Inc.

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

## REPORT OF ANALYSIS

For: (12552) NUTRA FLO  
(712)277-2011

Report Number  
96-121-2067

Date Reported: 04/30/96  
Date Received: 04/18/96

Mail to: NUTRA FLO  
PO BOX 2334  
1919 GRAND AVE  
SIOUX CITY IA 51107-

## FERTILIZER ANALYSIS

Lab number: 295796

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
<u>Sample ID: 1235 NULEX 20</u>					
Arsenic (total)	0.81	ppm	0.50	FURNACE AA	kem-04/29
Cadmium (total)	2.24	ppm	0.50	ICAP	jsm-04/29
Iron (total)	4.6	ppm	2.0	ICAP	jsm-04/29
Lead (total)	0.94	ppm	0.20	FURNACE AA	jsm-04/29
Manganese (total)	9.0	ppm	1.0	ICAP	jsm-04/29
<u>Sample ID: 1236 NULEX 10</u>					
Arsenic (total)	0.51	ppm	0.50	FURNACE AA	kem-04/29
Cadmium (total)	4.35	ppm	0.50	ICAP	jsm-04/29
Iron (total)	n.d.	ppm	2.0	ICAP	jsm-04/29
Lead (total)	0.50	ppm	0.20	FURNACE AA	jsm-04/29
Manganese (total)	2.6	ppm	1.0	ICAP	jsm-04/29
<u>Sample ID: 1237 NULEX 15</u>					
Arsenic (total)	n.d.	ppm	0.50	FURNACE AA	kem-04/29
Cadmium (total)	2.40	ppm	0.50	ICAP	jsm-04/29
Iron (total)	n.d.	ppm	2.0	ICAP	jsm-04/29
Lead (total)	n.d.	ppm	0.20	FURNACE AA	jsm-04/29
Manganese (total)	27.0	ppm	1.0	ICAP	jsm-04/29

The above analytical results apply only to the sample(s) submitted.

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## REPORT OF ANALYSIS

Account: 12552 NUTRA FLO  
Report Number: 98-009-2060

Page: 2

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
<u>Sample ID: NULEX 20 (LAB NO 3453)</u>					
Arsenic (total)	n.d.	ppm	4.00	FURNACE AA	pmd-01/09
Cadmium (total)	2.63	ppm	0.50	ICAP	jmr-01/09
Chromium (total)	n.d.	ppm	1.0	ICAP	jmr-01/09
Cobalt (total)	n.d.	ppm	1.0	ICAP	jmr-01/09
Lead (total)	n.d.	ppm	2.00	FURNACE AA	pmd-01/09
Mercury (total)	n.d.	ppm	0.05	EPA 7471	jsm-01/09
Nickel (total)	42	ppm	1.0	ICAP	jmr-01/09
Selenium (total)	n.d.	ppm	4.00	FURNACE AA	pmd-01/09

### Notes:

n.d. - Not Detected.

ICAP - Inductively Coupled Argon Plasma.

Respectfully Submitted

  
Heather Ramig  
Client Services

The above analytical results apply only to the sample(s) submitted.

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